

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:)	
)	Chapter 11
VOYAGER DIGITAL HOLDINGS, INC., <i>et al.</i> ,)	
)	Case No. 22-10943 (MEW)
Debtors. ¹)	
)	(Jointly Administered)

NOTICE OF APPEARANCE AND REQUEST FOR NOTICES

PLEASE TAKE NOTICE that the undersigned appears as counsel on behalf of the Plan Administrator established under the *Third Amended Joint Plan of Voyager Digital Holdings, Inc. and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code* (the “Plan”)² in the above-captioned cases, and hereby files this Notice of Appearance and Request for Notices (the “Notice”) requesting that all notices given or required to be given and all papers served or required to be served by U.S. Mail and by e-mail in the above-captioned cases be given to and served upon:

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-and-

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: Voyager Digital Holdings, Inc. (7687); Voyager Digital Ltd. (7224); and Voyager Digital, LLC (8013). The location of the Voyager Digital Holdings, Inc.’s and Voyager Digital Ltd.’s principal place of business is 33 Irving Place, Suite 3060, New York, NY 10003. Voyager Digital, LLC’s principal place of business is 701 S. Miami Ave, 8th Floor, Miami, FL 33131.

² Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Plan, attached as Exhibit A to the *Corrected and Amended Order (I) Approving the Second Amended Disclosure Statement and (II) Confirming the Third Amended Joint Plan of Voyager Digital Holdings, Inc. and Its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code* [Docket No. 1166].

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PLEASE TAKE FURTHER NOTICE that this Notice encompasses all notices, copies, and pleadings referred to in section 1109(b) of title 11 of the United States Code (the “Bankruptcy Code”) and in Rules 2002, 3017, 9007, and 9010 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), including, without limitation, notices of any orders, motions, demands, complaints, petitions, pleadings, plans of reorganization, disclosure statements, requests, or applications, and any other documents brought before this Court in this case, whether formal or informal, written or oral, or transmitted or conveyed by mail, delivery, telephone, telex or otherwise which affect or seek to affect the above cases.

PLEASE TAKE FURTHER NOTICE that neither this Notice nor any prior or later appearance shall be deemed or construed to be a waiver of any substantive or procedural rights of the Plan Administrator including, without limitation: (i) the right to have final orders in noncore matters only after de novo review by the United States District Court for the Southern District of New York (the “District Court”), (ii) the right to trial by jury in any proceedings so triable in these cases or in any case, controversy, or proceeding related to these cases, (iii) the right to have the District Court withdraw the reference in any matter

subject to mandatory or discretionary withdrawal, (iv) the right to have any matter in which this Court, absent consent of the parties, cannot enter final orders or judgments consistent with Article III of the United States Constitution heard by the District Court, or (v) any other rights, claims, actions, defenses, setoffs or recoupments to which the Plan Administrator is or may be entitled, in law, in equity, or otherwise, all of which rights, claims, actions, defenses, setoffs and recoupments are expressly reserved. Unless and until the Plan Administrator expressly states otherwise, the Plan Administrator does not consent to the entry of final orders or judgments by this Court if it is determined that this Court, absent consent of the parties, cannot enter final orders or judgments consistent with Article III of the United States Constitution.

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Dated: New York, New York
May 19, 2023

MCDERMOTT WILL & EMERY LLP

/s/ Darren Azman

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Counsel to the Plan Administrator

CERTIFICATE OF SERVICE

I hereby certify that on this 19th day of May 2023, I caused a true and correct copy of the foregoing *Notice of Appearance and Request for Notices* to be served via electronic notification pursuant to the CM/ECF system for the United States Bankruptcy Court for the Southern District of New York.

/s/ Darren Azman
Darren Azman